PERMIT CHECK LIST

The following people have reviewed the permit:

Reviewing Permitting Engineer: _____

Air Inspector: _____

Air Compliance Manager: _____

Date: January 10, 2008

Source Name: U.S. Coast Guard Integrated Support Command Portsmouth Registration No: 60410

Id. No.: 51-7410-00086

Source Location: 4000 Coast Guard Blvd, Portsmouth

Mail Address: 4000 Coast Guard Blvd, Portsmouth, VA 23703

Source Status: ____ Greenfield ✓ Currently operating

Source Classification: ___ Minor ✓ SynMinor ___ State Major ___ PSD Major ___ TV Major

Permit Action: The facility has requested to correct a permitting oversight regarding the abrasive blast media for blast booth SP-2. In addition, the facility would like to change the fuel for boiler B-3 to propane, remove one of the dynamometer inputs, change the reference numbers of all of the emergency generators, and correct the ratings for several of the generators. While the permit was open, the facility also decided to include a request to install a new powder coating operation and several new small space heaters.

Permit Action Program:

___ NSR ✓ SOP ___ TV ___ Maj HAP

Permit Action Type:

___ New / Article 6 Modification (delete one) ✓ Significant Amendment

___ Minor Amendment/Modification ___Administrative Amendment ___ Renewal

___ State Major ___ PSD ___ Non-Attainment ___ General

Y (Y/N) Permit Includes All Emission Units at Source.

Y (Y/N) Permit Allows Source to avoid Title V/MACT/etc.

After this permit, source is: ___ Major (A) ___ Minor (B) ✓ Synthetic minor (SM)

(PM, PM-10, CO, NOx, VOC, HAPs Pollutant)

Permit Application Review

✓ Permit application submitted, or ___ Letter Request

Application Received Date: August 29, 2007

Application Complete Date: December 21, 2007

Permit Deadline Date: March 20, 2008

✓ Document Certification Form received

N/A Confidential information with sanitized copy. If yes, which sections:

___ throughputs ___ individual pollutants ___ flow diagrams ___ calculations

___ process descriptions ___ other (describe)

If yes, has claim been accepted by DEQ? (Y/N) - Date of letter: _____

N/A Copy of letter from local official for greenfield, or major modified sources

N/A Copy of letter sent to FLM if applicable. (Comments)

N/A Notification of Affected State(s)

This permit supersedes permit(s) dated June 6, 2005..

Regulatory Review

Regulatory Review (cont.)

BACT Determination (check one):

___ [Control Strategy/Equipment] @ ___ % efficiency for the control of ____ meets BACT (Comments)_____, or

_✓_ TV/SOP/BACT not applicable. (Explain) SOP amendment

_N_ (Y/N) NSPS/MACT/NESHAPS Applicability: If Y, Subpart(s):

_____ NSPS

_____ MACT

_____ NESHAPS

_N_ (Y/N) Existing Rules (9 VAC 5 Chapter 40) Applicability: If Y, Rule(s):

Toxic Pollutants (check one):

___ Exempt, or _✓_ in compliance with 9 VAC 5-60-320, or ___ not evaluated

[Comments: _____]

Modeling (check one):

_✓_ Attached (including background monitors), or

___ Copy of approval letter from modeling section,

___ No modeling required by agency policy

Site Suitability:

_✓_ Site suitable from an air pollution standpoint, inspection date 06/19/2007.

_✓_ Calculation sheet(s) attached

_N_ (Y/N) NSR Netting Comments (Explain Permit History):

_N_ (Y/N) (CAM) Compliance Assurance Monitoring Applicable

Permit includes: ___ Stack Testing ___ CEM ___ VEE by source

Public Participation

_Y_ (Y/N) Public Noticed. If yes, Public Notice Date:

___(Y/N) Public Notice Comments. If yes, number and nature of comments:

___(Y/N) Public Hearing. If yes, Public Hearing Date:

EPA Review

_N_ (Y/N) EPA Review. If yes, Date proposed permit sent to EPA_____.

_N_ (Y/N) EPA Comments. If yes, give a brief summary_____.

Other Comments and Final Recommendations (attach memo or list below):

Comments: An inspection on June 19, 2007 found that the facility was using steel shot as the abrasive blast media in the SP-2 blasting booth, not aluminum oxide with glass beads, as outlined in its 2005 SOP. An RCA was issued on July 26, 2007 for this compliance issue.

The facility contends that the description of SP-2 in the permit is a mistake. A review of the facility's file shows that the facility submitted new information for both of the abrasive blasting booths in its application for the July 28, 2003 SOP amendment. In the application, the blasting media for SP-2 is listed as steel shot; however, it was included in the permit as aluminum oxide and glass beads (as used in SP-1). The facility would like to have this oversight corrected in the permit to prevent any future confusion. The change in blast media for SP-2 was evaluated for Article 6 permitting applicability. The PTE using the steel shot media was calculated and compared to the average past actual emissions from the blasting operations for 2005 and 2006.

Regulatory Review (cont.)

The NEI was found to be above the PM/PM-10 Article 6 thresholds for a modification. The blast media for SP-2 has been corrected in Conditions 2 and 14. The emission limits in Conditions 25 and 28 have been re-calculated to reflect the change in media. While researching this issue, it was discovered that the description of SP-2 as a "*buoy* blasting booth" was incorrect. SP-2 will be correctly listed in Condition 2 as a "miscellaneous metal parts blasting booth." The control device for SP-2 was also found to be incorrect. Both booths are now correctly listed in Condition 4 as having a full enclosure, venting to cartridge filters.

The facility would like to take this opportunity to make several other changes to update the permit.

The facility has requested that the approved fuel for boiler, B-3, be changed to propane, as this boiler was converted to this fuel in 2005. In addition, the facility plans to install several additional small propane-fired boilers (SH-1, SH-2, GP-1, GP-2, GP-3, and GP-4) to provide space heating. The conversion of boiler B-3 to propane and the inclusion of the six additional propane boilers were evaluated for NSR permitting applicability. The PTE of all boilers were found to be well below the exemption thresholds for a modification under Article 6; however, the boilers will be included in the SOP to account for the units in the equipment list and to include the emissions in the facility wide emission limits. The current permit allows for the use of propane in all of the currently permitted boilers (B-1 to B-20); however, the boiler emission limits only cover the operation of the boilers on distillate oil. The permit will be changed to allow for the use of only distillate oil in boilers B-1, B-2, B-4 to B-16, and B-18 to B-20 and the use of propane in boilers B-3, B-17 (B-17 was approved to use propane in a 2004 amendment), SH-1 and SH-2, and GP-1 to GP-4. Condition 2 has been updated to include the new boilers and to list B-3 and B-17 as propane-fired units. The fuel specifications for propane have been included in Condition 20.

The facility has removed the E-2 dynamometer input. The equipment list has been updated to reflect the removal of this unit. The emission limits in Conditions 23 and 28 have been re-calculated to account for the operation of only E-1 for 250 hrs/yr (as requested by the facility). All associated conditions have been updated as well.

The facility has noted that some of the rated capacities for the emergency generators in Condition 2 are incorrect. The facility has submitted the correct ratings for each unit and these have been changed in the equipment list. The facility-wide emission limits in Condition 28 have also been corrected.

The facility has requested to change the reference numbers for all of the emergency generators to the reference numbers listed in the ISC's maintenance system (and located on the units themselves). This has been noted in Conditions 2, 10, 18, 29, and 33b. This will bring the information in line with the facility's records and prevent any confusion during future inspections of the facility. Condition 2 has also been changed to update the descriptions and locations of the degreasers.

The facility is planning to install a powder coating operation in the near future. The powder coating gun, PCG-1, will be used primarily in existing coating booth, P-5, however, it will be moved to other booths as needed (depending on the size of the parts being coated). The installation of the new gun was evaluated for minor NSR permitting applicability. The potential PM/PM-10 emissions were calculated and found to be well below the exemption thresholds for an Article 6 modification; however the facility is synthetic minor for PM/PM-10 and the emissions from the new unit must be included in the facility wide emission limits. The fabric filters installed in the existing spray booths (99 % control efficiency) will be used to control particulate emissions from the new gun. The controlled emissions at 8760 hr/yr of operation have been included in the facility-wide emission limits in Condition 28. The facility also plans to install an electric drying oven for the powder coating operations; however, it is not necessary to list this unit in the permit.

Regulatory Review (cont.)

Several other changes have been made while the permit was open. The emissions from the outdoor small arms firing range have been re-evaluated. When the 1996 permit was drafted, only emission factors for Pb and CO were available. In September 2006, EPA published updated factors for small arms fire. AP-42, Chapter 15 now contains factors for Pb, CO, NOx, PM, PM-10, and various HAPs. It is important to re-evaluate the range to take into account the new, updated factors and the additional pollutants. The CO emissions were found to be above the 0.5 ton/yr significance level for permitting. A throughput limit has been included in Condition 15, and the CO ton/yr emission limit has been included in Condition 27. The predicted emissions of all pollutants have also been included in the facility-wide limits in Condition 28. The new emission factors for HAPs were also used to determine applicability to the existing source toxics rule. The potential emissions of both Antimony and Lead were found to be above the lb/hr and ton/yr exemption thresholds outlined in 9 VAC 5-60-300 for these pollutants. The predicted emissions were modeled using the SCREEN3 volume source model (for non-point source emissions). The following parameters were used: the lb/hr emission rate, the release height, the distance to the roof of the range shelter, and the firing distance (the distance to the bullet trap). The predicted ton/yr HAP emissions have been included in the facility-wide HAP emission limit; however the emissions are so small that there is no change to the current limit.

The facility has installed a new bullet trap system at the outdoor small arms range in recent years and has requested to have the control device included in the permit. The bullet trap is equipped with a dust collection unit to trap and contain the particulate emissions resulting from the impact of the bullet on the trap wall. Unfortunately, the AP-42 emission factors for small arms fire apply only to the emissions from the actual firing of the bullets, not the emissions caused by the fragmentation of the bullets as they hit the bullet trap. Because the control device has no effect on the calculated emissions, it has not been included in the permit.

The permit has been updated with current boilerplate language and formatting. MEK has been removed from the HAP emissions, as it is no longer on the state toxics list. The total HAP contribution from the coating operations (15.0 ton/yr) will remain unchanged. The limit for "Any Other HAP" has been changed from 3.0 to 4.0 tons/yr to make up the difference. No changes to the facility-wide HAPs limit are necessary. The HAP emission limits have been moved to a “State-Only Enforceable” section at the end of the permit. This is necessary to emphasize that the toxics regulations have not been SIP-approved.

While researching this action, it was discovered that the facility requested to have four 100-gallon propane tanks included in the permit in a letter dated October 6, 2003. These tanks were intended to replace Tank T-21, which was removed. The emissions from these pressurized tanks were found to be negligible and the units were not included in the permit; however, Tank T-21 has been removed from Condition 2. No emission limits were included for this tank originally, so no changes to the permitted emission limits are necessary.

This permit action requires/changes the case-by-case determination of several emission limits, thus it will be processed as a significant amendment to the State Operating Permit. A public notice and 30-day public comment period will be necessary to implement the changes. The Article 6 modification required for the change in abrasive blast media for the SP-2 booth will be processed concurrently with this SOP amendment.

Final Recommendation: Recommend Approval.

Environmental Engineer's Signature: _____

Air Permit Manager's Signature: _____

January 10, 2008

Captain Steven J. Andersen
Commanding Officer
U.S. Coast Guard Integrated Support Command
4000 Coast Guard Boulevard
Portsmouth, Virginia 23703

Location: Portsmouth
Registration No.: 60410

Dear Captain Andersen:

Attached is a significant amendment to your state operating permit dated June 6, 2005 to operate a marine industrial support facility in accordance with the provisions of the Virginia Regulations for the Control and Abatement of Air Pollution. This amended permit supersedes your permit dated June 6, 2005.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

The Department of Environmental Quality (DEQ) deemed the application complete on December 21, 2007 and has determined that the application meets the requirements of 9 VAC 5-80-990 A for a significant amendment to a state operating permit. The Department solicited written public comments by placing a newspaper advertisement in the {insert name of newspaper} on {insert date of publication}. The required comment period provided by 9 VAC 5-80-1170 D expired on {insert date comment period ended}.

This permit approval to operate shall not relieve the U.S. Coast Guard Integrated Support Command of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. 9 VAC 5-170-200 provides that you may request direct consideration of the decision by the Board

if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218-1105

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Lindsey M. Evans at (757) 518-2168.

Sincerely,

Jane A. Workman
Air Permit Manager

JAW/LME/60410_007_08_SOPsigamd

Attachment: Permit

cc: Director, OAPP (electronic file submission)
Manager, Data Analysis (electronic file submission)
Manager/Inspector, Air Compliance

STATIONARY SOURCE PERMIT TO OPERATE

This permit supersedes your permit dated June 6, 2005.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

U.S. Coast Guard Integrated Support Command
4000 Coast Guard Boulevard
Portsmouth, Virginia 23703
Registration No.: 60410

is authorized to operate

a marine industrial support facility

located at

4000 Coast Guard Boulevard
Portsmouth, Virginia

in accordance with the Conditions of this permit.

Approved on DRAFT.

Francis L. Daniel

Permit consists of 12 pages.
Permit Conditions 1 to 42.

INTRODUCTION

1. This permit approval is based on the permit applications dated August 31, 1995, September 16, 2002, August 21, 2007, and November 6, 2007, including amendment information dated November 22, 1995, February 9, 1996, May 29, 1996, April 13, 2001, December 17, 2002, February 12, 2003, April 3, 2003, April 21, 2003, June 6, 2003, October 6, 2003, December 23, 2003, June 30, 2004, March 21, 2005, September 13, 2007, October 1, 2007, October 18, 2007, December 3, 2007, December 5, 2007, December 6, 2007, and December 21, 2007. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

   Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-10 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

   Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

   The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

2. **Equipment List** - Equipment at this facility consists of the following:

Equipment to be included with this permit		
Reference No.	**Equipment Description**	**Rated Capacity**
PCG-1	Powder coating spray gun	5 lbs/hr
B-3	Propane-fired boiler	0.793 mmBtu/hr
SH-1 and SH -2	Propane-fired boilers	0.036 mmBtu/hr total
GP-1 to GP-4	Propane-fired boilers	4.446 mmBtu/hr total

Equipment permitted prior to the date of this permit			
Reference No.	**Equipment Description**	**Rated Capacity**	**Original Permit Date**
B-1, B-2, B-4 to B-16, B-18 to B-20	Distillate oil-fired boilers	28.0 mmBtu/hr total (0.15 to 8.4 mmBtu/hr)	August 23, 1996 June 6, 2005
B-17	Propane-fired boiler	0.151 mmBtu/hr	January 23, 2004
E-1	Dynamometer input for testing diesel engines	Diesel engines up to 450 hp	August 23, 1996
10853	Emergency generator - Admin/ESU	250 KW	July 28, 2003
10856	Emergency generator - Security	35 KW	July 28, 2003
10857	Emergency generator - Sewage Lift Station	75 KW	July 28, 2003

33757	Emergency generator - Sector Hampton Roads	100 KW	August 24, 2004
33869	Emergency generator - Uniformed Personnel Housing	200 KW	July 28, 2003
38925	Emergency generator - ESD	200 KW	August 24, 2004
P-1	Spray coating booth - Boat Wood Shop	1 gal/hr	August 23, 1996
P-2	Spray coating area - Industrial Fiberglass Shop	1 gal/hr	August 23, 1996
P-3	Spray coating booth - buoy paint booth	5 gal/hr	August 23, 1996
P-4	Spray coating booth - Vessel Shop	80 gal/hr	August 23, 1996
P-5	Spray coating booth - small parts (located inside P-4)	1 gal/hr	July 28, 2003
P-6	Spray coating area - fiberglass prep area	N/A	July 28, 2003
DG-1	Solvent parts washer - Sector Engineering	1 gal/hr	August 23, 1996
DG-2 to DG-3	Solvent parts washers - Industrial Division Machine Shop	1 gal/hr	August 23, 1996 July 28, 2003
DG-4	Solvent parts washer - Industrial Division Engine Room	1 gal/hr	July 28, 2003
DG-5	Solvent parts washer - MWR Hobby Shop	1 gal/hr	August 23, 1996
DG-6	Solvent parts washer - Central Mechanical Plant	1 gal/hr	July 28, 2003
DG-7	Solvent parts washer - Armory	1 gal/hr	August 23, 1996
DG-8	Solvent parts washer - Facilities Engineering Motor Pool	1 gal/hr	July 28, 2003
DG-9	Solvent parts washer - Naval Engineering Support Unit (NESU)	1 gal/hr	July 28, 2003
SP-1	Buoy blasting booth, using aluminum oxide and glass beads	2 tons/hr	August 23, 1996
SP-2	Miscellaneous metal parts blasting booth, using steel shot	2 tons/hr	August 23, 1996
W-1	Woodworking shop w/ cyclone - Industrial Division	N/A	August 23, 1996
W-2	Woodworking shop w/ cyclone - Facilities Engineering Division	N/A	August 23, 1996
W-3	Woodworking shop w/cyclone - MWR Hobby Shop	N/A	August 23, 1996
W-4	Woodworking shop w/cyclone - Sector Engineering	N/A	July 28, 2003
T-1 to T-4, T-6 to T-20, T-22, T-25 to T-28	Fuel oil storage tanks	500 - 4000 gallons	August 23, 1996
T-23 and T-24	Gasoline storage tanks	2000 gallons each	August 23, 1996
R-1	Outdoor small arms firing range	10,000 rounds/hr	August 23, 1996
WELD-1	Eight (8) welding machines - Structure Shop, Machine Shop, and NESU Shop	N/A	August 23, 1996

Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit.
(9 VAC 5-80-850)

3. **Emission Controls -** Particulate emissions from coating booths P-1, P-3, P-4, and P-5 and coating areas P-2 and P-6 shall be controlled by dry filters. The filters shall be provided with adequate access for inspection and shall be in operation when the spray coating booths/areas are operating.
(9 VAC 5-80-850 and 9 VAC 5-50-260)

4. **Emission Controls -** Particulate emissions from each of the abrasive blasting booths (SP-1 and SP-2) shall be controlled by a full enclosure, venting to cartridge filters. The filters shall be provided with adequate access for inspection and shall be in operation when the abrasive blasting booths are operating.
(9 VAC 5-80-850)

5. **Emission Controls -** Particulate emissions from each of the four woodworking shops (W-1, W-2, W-3, and W-4) shall be controlled by cyclones. The cyclones shall be provided with adequate access for inspection and shall be in operation when the woodworking shops are operating. The cyclones shall be inspected annually by the permittee to ensure structural integrity. The permittee shall keep a log of the details of the annual cyclone integrity inspections.
(9 VAC 5-80-850 and 9 VAC 5-50-260)

6. **Monitoring Devices** - The dry filters installed to control particulate emissions from the spray coating booths (P-1, P-3, P-4, and P-5) and the spray coating areas (P-2 and P-6) shall be equipped with devices to continuously measure differential drop across the filters. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection and shall be in operation when the spray coating booths/areas are operating.
(9 VAC 5-80-850 and 9 VAC 5-50-260)

7. **Monitoring Device Observation** - To ensure good performance of the dry filters, the devices used to continuously measure differential pressure drop across the filters shall be observed by the permittee with a frequency of not less than once per operating day. The permittee shall keep a log of the observations from the monitoring devices.
(9 VAC 5-80-850)

8. **VOC Work Practice Standards** - At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.
(9 VAC 5-50-20 F and 9 VAC 5-80-850)

OPERATING LIMITATIONS

9. **Operating Hours** - The diesel engine connected to the dynamometer input (E-1) shall not operate more than 250 hours per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

10. **Operating Hours** - Each emergency generator (10853, 10856, 10857, 33757, 33869, and 38925) shall not operate more than 370 hours per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850 and 9 VAC 5-50-260)

11. **Throughput** - The total throughput of spray coatings and thinners (combined) to coating booths P-1, P-3, P-4, and P-5 and coating areas P-2 and P-6, combined, shall not exceed 8,800 gallons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

12. **Throughput** - The total throughput of fresh parts washer solvent delivered to the solvent parts washers (DG-1 to DG-9), combined, shall not exceed 700 gallons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

13. **Throughput** - The total throughput of blast media to blasting booth SP-1 shall not exceed 200 tons of fresh aluminum oxide and glass beads (combined) per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

14. **Throughput** - The throughput of blast media to blasting booth SP-2 shall not exceed 75 tons of fresh steel shot per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

15. **Throughput** - The total throughput of ammunition to the small arms firing range (R-1) shall not exceed 2,000,000 rounds per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

16. **Fuel** - The approved fuel for boilers B-1, B-2, B-4 to B-16, and B-18 to B-20 is distillate oil. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-850)

17. **Fuel** - The approved fuel for boilers B-3, B-17, SH-1, SH-2, and GP-1 to GP-4 is propane. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-850)

18. **Fuel** - The approved fuel for each emergency generator (10853, 10856, 10857, 33757, 33869, and 38925) and each diesel engine connected to the dynamometer input (E-1) is distillate oil. A change in the fuel may require a permit to modify and operate.
(9 VAC 5-80-850)

19. **Fuel Throughput** - Boilers B-1, B-2, B-4 to B-16, and B-18 to B-20 (combined) shall consume no more than 200,000 gallons of distillate oil per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9 VAC 5-80-850)

20. **Fuel -** The distillate oil and propane shall meet the specifications below:

DISTILLATE OIL which meets the ASTM D396 specification for numbers 1 or 2 fuel oil:
Maximum sulfur content per shipment: 0.5 %

PROPANE which meets the ASTM D1835 specification for liquefied petroleum gases

(9 VAC 5-80-850)

21. **Fuel Certification** - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:
    a. The name of the fuel supplier;
    b. The date on which the distillate oil was received;
    c. The quantity of distillate oil delivered in the shipment;
    d. A statement that the distillate oil complies with the American Society for Testing and Materials specifications (ASTM D396) for numbers 1 or 2 fuel oil

    Fuel sampling and analysis, independent of that used for certification, as may be periodically required or conducted by DEQ may be used to determine compliance with the fuel specifications stipulated in Condition number 21. Exceedance of these specifications may be considered credible evidence of the exceedance of emission limits.
    (9 VAC 5-80-850)

EMISSION LIMITS

22. **Process Emission Limits** - Emissions from the operation of boilers B-1, B-2, B-4 to B-16, and B-18 to B-20 shall not exceed the limits specified below:

Sulfur Dioxide	7.1 tons/yr
Nitrogen Oxides (as NO_2)	2.0 tons/yr
Carbon Monoxide	0.5 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission

limits. Compliance with these emission limits may be determined as stated in Condition numbers 17, 20, 21, and 22.
(9 VAC 5-80-850)

23. **Process Emission Limits** - Emissions from the operation of the diesel engines connected to the dynamometer input (E-1), shall not exceed the limits specified below:

Nitrogen Oxides (as NO_2)	0.6 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 10, 19, 21, and 22.
(9 VAC 5-80-850)

24. **Process Emission Limits** - Emissions from the operation of the spray coating booths (P-1, P-3, P-4, and P-5) and the spray coating areas (P-2 and P-6) shall not exceed the limits specified below:

Volatile Organic Compounds (VOCs)	20.0 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 3, 7, 8, and 12.
(9 VAC 5-80-850)

25. **Process Emission Limits** - Emissions from the operation of the abrasive blasting booths (SP-1 and SP-2), combined, shall not exceed the limits specified below:

Particulate Matter	1.0 tons/yr
PM-10	0.5 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 4, 5, 14, and 15.
(9 VAC 5-80-850)

26. **Process Emission Limits** - Emissions from the operation of the four woodworking shops (W-1 to W-4), combined, shall not exceed the limits specified below:

Particulate Matter	26.3 tons/yr
PM-10	13.2 tons/yr

These emissions are derived from the estimated overall emission contribution from unlimited hours of operation, which precludes the need for operating limits and recordkeeping.
(9 VAC 5-80-850 and 9 VAC 5-50-260)

27. **Process Emission Limits** - Emissions from the operation of the outdoor small arms firing range (R-1) shall not exceed the limits specified below:

Carbon Monoxide	2.8 tons/yr

These emissions are derived from the estimated overall emission contribution from unlimited hours of operation, which precludes the need for operating limits and recordkeeping.
(9 VAC 5-80-850)

28. **Facility-wide Emission Limits** - Total emissions from the marine industrial support facility shall not exceed the limits specified below:

Particulate Matter (PM)	29.2 tons/yr
PM-10	15.5 tons/yr
Sulfur Dioxide	7.4 tons/yr
Carbon Monoxide	5.4 tons/yr
Nitrogen Oxides (as NO_2)	13.0 tons/yr
Volatile Organic Compounds	21.4 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition numbers 3 through 22.
(9 VAC 5-80-850 and 9 VAC 5-50-260)

29. **Visible Emission Limit** - Visible emissions from each boiler (B-1 to B-20), emergency generator (10853, 10856, 10857, 33757, 33869, and 38925), and diesel engine connected to the dynamometer (E-1) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-850)

30. **Visible Emission Limit** - Visible emissions from the exhaust of each abrasive blasting booth (SP-1 and SP-2) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-850)

31. **Visible Emission Limit** - Visible emissions from the exhaust of each coating booth (P-1, P-3, P-4, and P-5) and each coating area (P-2 and P-6) shall not exceed 5 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-850 and 9 VAC 5-50-260)

32. **Visible Emission Limit** - Visible emissions from the exhaust of each woodworking cyclone (W-1 to W-4) shall not exceed 10 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 20 percent opacity as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-850 and 9 VAC 5-50-260)

RECORDS

33. **On Site Records** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Tidewater Regional Office. These records shall include, but are not limited to:

    a. Annual hours of operation of the diesel engine connected to the dynamometer input (E-1), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    b. Annual hours of operation of each emergency generator (10853, 10856, 10857, 33757, 33869, and 38925), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    c. Annual throughput of coatings and thinners (combined) to the spray coating booths and the spray coating areas (P-1 to P-6), calculated monthly as the sum of each consecutive 12-month period. Compliance for the 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

    d. Annual throughput of fresh parts washer solvent delivered to the solvent parts washers (DG-1 to DG-9), calculated monthly as the sum of each consecutive 12-month period. Compliance for the 12-month

period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

e. Annual throughput of fresh aluminum oxide and glass bead media (combined) to abrasive blasting booth SP-1, calculated monthly as the sum of each consecutive 12-month period. Compliance for the 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

f. Annual throughput of fresh steel shot media to abrasive blasting booth SP-2, calculated monthly as the sum of each consecutive 12-month period. Compliance for the 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

g. Annual throughput of ammunition to the small arms firing range (R-1), calculated monthly as the sum of each consecutive 12-month period. Compliance for the 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

h. Annual throughput of distillate oil to boilers B-1, B-2, B-4 to B-16, and B-18 to B-20 (combined) calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

i. All fuel supplier certifications, as required by Condition 22.

j. Current Material Safety Data Sheets (MSDS), or other vendor information as approved by DEQ, showing the VOC and HAP content for each coating, thinner, and parts washer solvent used.

k. Annual facility-wide HAP emissions, calculated using current MSDS specifications and coating, thinner, and parts washer solvent usage. The emissions shall be calculated monthly as the sum of each consecutive 12-month period.

l. Records of the annual inspections of cyclone integrity at the four woodworking shops (W-1 to W-4) to demonstrate compliance with Condition 6.

These records shall be available for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-850)

GENERAL CONDITIONS

34. **Right of Entry** - The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;

b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;

c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and

d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130 and 9 VAC 5-80-850)

35. **Notification for Facility or Control Equipment Malfunction** - The permittee shall furnish notification to the Director, Tidewater Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone, or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Tidewater Regional Office in writing.
(9 VAC 5-20-180 C and 9 VAC 5-80-850)

36. **Violation of Ambient Air Quality Standard** - The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I and 9 VAC 5-80-850)

37. **Maintenance/Operating Procedures** - At all times, including periods of start-up, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the affected source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions.
(9 VAC 5-50-20 E and 9 VAC 5-80-850)

38. **Permit Suspension/Revocation** - This permit may be revoked if the permittee:

a. Knowingly makes material misstatements in the permit application or any amendments to it;

b. Fails to comply with the terms or conditions of this permit;

c. Fails to comply with any emission standards applicable to a permitted emissions unit;

d. Causes emissions from this facility which result in violations of, or interferes with the attainment and maintenance of, any ambient air quality standard;

e. Fails to operate this facility in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time that an application for this permit is submitted;

f. Fails to comply with the applicable provisions of Articles 6, 8 and 9 of 9 VAC 5 Chapter 80.
(9 VAC 5-80-1010)

39. **Change of Ownership** - In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Tidewater Regional Office of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-940)

40. **Permit Copy** - The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-80-860 D)

STATE-ONLY ENFORCEABLE REQUIREMENTS

41. **Process Emission Limits** - Emissions from the operation of the spray coating booths (P-1, P-3, P-4, and P-5) and the spray coating areas (P-2 and P-6), combined, shall not exceed the limits specified below:

Hazardous Air Pollutants	
Xylene	5.0 tons/yr
Toluene	4.0 tons/yr
Methyl Isobutyl Ketone	1.0 tons/yr
Ethyl Benzene	1.0 tons/yr
Any Other HAP	4.0 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number 34k.
(9 VAC 5-80-850 and 9 VAC 5-60-320)

42. **Facility-wide Emission Limits** - Total emissions from the marine industrial support facility shall not exceed the limits specified below:

Total Hazardous Air Pollutants	16.0 tons/yr

These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number 34k.
(9 VAC 5-80-850 and 9 VAC 5-60-320)

DRAFT PERMIT APPROVAL FORM

Department of Environmental Quality
Tidewater Regional Office
5636 Southern Blvd.
Virginia Beach, Virginia 23462

Instructions:

The "Draft Permit Approval Form" provides the owner or certified company official an opportunity to accept or suggest appropriate changes to a draft permit. If a signed form is not received within one (1) week of the date of receipt of the draft permit, DEQ will assume that the draft permit is considered acceptable and will proceed with processing the permit. **Please check the applicable statement(s) below after thoroughly reviewing the draft permit. Forms may be returned by facsimile to 757-518-2009, Attention:** Ms. Lindsey M. Evans or Ms. Jane A. Workman.

____ The owner or certified company official agrees with the conditions of the draft permit dated _____. Please proceed to issue the permit with no change.

____ The owner or certified company official finds condition number(s) _____ of the draft permit dated _____ unacceptable.

____ The suggested changes are attached for your consideration.

____ The owner or certified company official requests further discussion with DEQ regarding the above referenced condition(s).

Signature: _____

Name: _____

Title: _____

Facility: _____

Date: _____